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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Dillan Lucus Keeney,
Plaintiff,

vs.

Frank Bisignano, COMMISSIONER OF
SOCIAL SECURITY¹,
Defendant.

Case No. 1:25-cv-00467-JLT-GSA
STIPULATION AND ORDER FOR
EXTENSION OF TIME

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from August 1, 2025 to September 30, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S

¹ Frank Bisignano became the Commissioner of Social Security on May 7, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Frank Bisignano should be substituted for Leland Dudek as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 MOTION FOR SUMMARY JUDGEMENT. All other dates in the Court's
2 Scheduling Order shall be extended accordingly.

3 This is Plaintiff's first request for an extension of time. Plaintiff respectfully
4 states that the requested extension is necessary due several merit briefs being due
5 on the same week. For the weeks of July 28, 2025 and August 4, 2025, Plaintiff's
6 Counsel has fourteen merit briefs due and eight reply briefs due. Counsel requires
7 additional time to brief the issues thoroughly for the Court's consideration.
8 Defendant does not oppose the requested extension. Counsel apologizes to the
9 Defendant and Court for any inconvenience this may cause.

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11 Respectfully submitted,

12 Dated: July 25, 2025

PENA & BROMBERG, ATTORNEYS AT LAW

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14 By: /s/ Jonathan Omar Pena
15 JONATHAN OMAR PENA
16 Attorneys for Plaintiff

17
18 Dated: July 25, 2025

MICHELE BECKWITH
Acting United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation
Social Security Administration

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21 By: */s/ Franco L. Becia
22 Franco L. Becia
23 Special Assistant United States Attorney
24 Attorneys for Defendant
25 (*As authorized by email on July 25, 2025)
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ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: **July 25, 2025**

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE